

## REMARKS

Claims 1, 4-5, 16, 18, 20-21 and 27 stand rejected under 35 U.S.C. 102(b) as being anticipated by Konovalov et al. (SID, Society of Information Display, May 17-22, 1998, P1127). Applicants respectfully traverse the rejection of claim 1 because the cited prior art does not disclose (or suggest), among other things, a width of the insulating patterns being set larger than a width of a gap between the insulating patterns, as now recited in amended claim 1.

As shown in FIG. 15 of the present application, transparent insulating films 70, 71 and 72 have widths that are larger than a width of a gap between the transparent insulating films. Accordingly, the present invention advantageously is able to have a desired two-stage driving of the liquid crystal molecules, as shown in FIGs. 21-23. For example, FIG. 22 shows a first transition of the liquid crystal molecules in FIGs. 22(A) and (B) in a first region upon application of a low drive voltage, while FIGs. 22(C) and (D) show a second transition of the liquid crystal molecules in a second region upon application of a high drive voltage. Since Konovalov does not disclose or suggest this feature, withdrawal of the §102(b) rejection of claim 1 and its depending claims is respectfully requested.

In addition, Applicants traverse the rejection because the cited prior art does not disclose (or suggest) a pair of polarizers being disposed at respective outer sides of said substrates.

Konovalov discloses a liquid crystal display device with a pair of substrates having electrodes. (See FIG. 1). The Office Action cites on page 3, item 2, third paragraph

that Konovalov teaches a pair of polarizers in the FIG. 2 description. However, Konovalov merely teaches the following:

In Figure 2 polaroids were orientated at 45° to the director in the center of the cell. This ensures comparability of the results for textures with different twist (for polaroids orientated along the director tilt in the center of the cell non-twisted structure remains permanently dark, while twisted one can give rather high transmission).

Konovalov does not teach polarizers being disposed at respective outer sides of the substrates.

In contrast, independent claim 1 of the present invention recites, among other things, a pair of polarizers being disposed at respective outer sides of the substrates. This relationship between the position of the polarizers with respect to the substrates and each other is neither taught nor suggested by Konovalov. Accordingly, Applicants submit that a *prima facie* case of anticipation has not been made against claim 1 of the present invention, and the rejection should therefore be withdrawn for this additional reason.

To establish a *prima facie* case of anticipation against the claimed invention, all claimed limitations must be taught by the prior art. In the present case, this requirement has not been satisfied. The present invention does not merely claim a pair of polarizers, as suggested by the Examiner, but also defines a relationship between the position of the polarizers relative to the substrates. This recited relationship is a patentably distinct feature

of the present invention which must be shown by the Examiner to be taught by the prior art of record to establish a *prima facie* case of anticipation. Because no such relationship between these polarizers is taught by the cited prior art reference of record, no *prima facie* case of anticipation has been established. For this additional reason, withdrawal of the §102 rejection of independent claim 1 and its respective depending claims 4-5, 18, 20-21 and 27 is respectfully requested.

Claims 3, 6, 9-16, 19 and 22-26 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Konovalov in view of Hisatake et al. (U.S. Patent No. 5,434,690). Applicants respectfully traverse the rejection for the reasons recited above with respect to the rejection of independent claim 1, and also because Hisatake fails to remedy the deficiencies noted above.

Since claims 3, 6, 9-16, 19 and 22-26 ultimately depend upon claim 1, they necessarily include all the features of claim 1 plus other additional features. Thus, Applicants submit that the §103 rejection of these claims has also been overcome for the same reasons mentioned above to overcome the rejection of independent claim 1, and also because Hisatake fails to remedy the deficiencies of Konovalov. Applicants respectfully request that the §103 rejection of claims 3, 6, 9-16, 19 and 22-26 be withdrawn.

Applicants further traverse the rejection because the Examiner has failed to establish a *prima facie* case of obviousness. Section 2143.03 of the MPEP requires that, to establish a *prima facie* case of obviousness against the claimed invention, all claimed limitations must be taught or suggested by the prior art. In the present case, this requirement

from the MPEP has not been satisfied. As stated above, the present invention does not merely claim a pair of polarizers, but also defines a relationship between the polarizers and the substrates as to the location of the polarizers. This recited relationship is a patentably distinct feature of the present invention which must be shown by the Examiner to be taught or suggested by the prior art of record to establish a *prima facie* case of obviousness. Because no such relationship between the polarizers and the substrates is taught or suggested by the cited prior art references, no *prima facie* case of obviousness has been established. For this additional reason, withdrawal of the §103 rejection of claims 3, 6, 9-16, 19 and 22-26 is respectfully requested.

New claim 28 is added for consideration and features the second region having a total area exceeding 50% of a total display area of the liquid crystal display device. Applicants earnestly solicit allowance of new claim 28 for the reasons provided above with respect to the rejection of independent claim 1, and also because of the features recited in this claim.

For all of the foregoing reasons, Applicants submit that this Application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite the prosecution.

Respectfully submitted,

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